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February 14, 2006

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**AIR ENFORCEMENT BRANCH,  
U.S. EPA, REGION 5**

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Bureau Chief, Air Bureau  
State of Connecticut  
Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Gentlemen and Ladies:

Re: Submittal of First Semi-Annual Progress Report Pursuant Paragraph 141 of the  
Consent Decree, Entered in Civil Action No. C2-99-1181

Ohio Edison Company (OE) submits its semi-annual progress report for the period beginning with the entry of the Consent Decree (CD) through December 31, 2005, as required by paragraph 141 of the CD.

**Appendix (B)(I)(A) Installation of NO<sub>x</sub> and SO<sub>2</sub> Equipment**

| <b>Project</b>                                  | <b>Construction Schedule</b> | <b>Date of Contract Execution</b> | <b>Major Component Delivery</b> | <b>Estimated Percentage Complete</b> | <b>Estimated Construction Completion</b> | <b>Date of Final Installation</b> | <b>Acceptance Test</b> |
|-------------------------------------------------|------------------------------|-----------------------------------|---------------------------------|--------------------------------------|------------------------------------------|-----------------------------------|------------------------|
| SA 1-2, 4-7 Low NO <sub>x</sub> Burners         |                              |                                   |                                 | 100 %                                |                                          | In-service prior to CD            |                        |
| SA 1-2, 4, 6-7 Overfired Air                    |                              |                                   |                                 | 100 %                                |                                          | In-service prior to CD            |                        |
| SA 1-5 Combustion Optimization                  | See attached Schedule        | 4/14/05                           | All Equipment Received          | 100%                                 |                                          | 11/2/05                           | N/A                    |
| SA 1 SNCR                                       | See attached Schedule        | N/A – FE General Contractor       |                                 |                                      | 5/12/06                                  |                                   |                        |
| SA 2 SNCR                                       |                              |                                   |                                 | 100%                                 |                                          | In-service prior to CD            |                        |
| SA 3 SNCR                                       | See attached Schedule        | N/A – FE General Contractor       | All Equipment Received          | 100%                                 |                                          | 11/07/05                          | N/A                    |
| SA 4 SNCR                                       | See attached Schedule        | N/A – FE General Contractor       |                                 |                                      | 5/5/06                                   |                                   |                        |
| SA 5 SNCR                                       | See attached Schedule        | N/A – FE General Contractor       | All Equipment Received          |                                      | 5/1/06                                   |                                   |                        |
| SA 6 SNCR                                       | See attached Schedule        | N/A – FE General Contractor       | All Equipment Received          | 100%                                 |                                          | 6/3/05                            | N/A                    |
| SA 7 SNCR                                       |                              |                                   |                                 | 100%                                 |                                          | In-service prior to CD            |                        |
| SA 6 SCR                                        | See attached Schedule        | January 2005                      |                                 |                                      | 3/28/09                                  |                                   |                        |
| SA 7 SCR                                        | See attached Schedule        | January 2005                      |                                 |                                      | 3/27/10                                  |                                   |                        |
| SA 1-4 SO <sub>2</sub> Removal System           | To Be Developed              | 8/26/05                           |                                 |                                      |                                          |                                   |                        |
| SA 5 SO <sub>2</sub> Removal System             | To Be Developed              | 8/26/05                           |                                 |                                      |                                          |                                   |                        |
| SA 6 & 7 SO <sub>2</sub> Removal System         | To Be Developed              | 8/26/05                           |                                 |                                      |                                          |                                   |                        |
| MN 1 Scrubber Upgrades                          | See attached Schedule        | N/A – FE General Contractor       | All Equipment Received          | 100%                                 |                                          | 12/3/05                           | N/A                    |
| MN 2 Scrubber Upgrades                          | See attached Schedule        | N/A – FE General Contractor       |                                 |                                      | 12/2/06                                  |                                   |                        |
| MN 3 Scrubber Upgrades                          | See attached Schedule        | N/A – FE General Contractor       |                                 |                                      | 12/8/07                                  |                                   |                        |
| EL 5 Low NO <sub>x</sub> Burners, Overfired Air |                              |                                   |                                 | 100%                                 |                                          | In-service prior to CD            |                        |
| EL 5 SNCR                                       | See attached Schedule        | N/A – FE General Contractor       |                                 |                                      | 3/12/07                                  |                                   |                        |

**Appendix (B)(I)(B) 30-Day Rolling Average Emission Rates for NO<sub>x</sub> and SO<sub>2</sub>**

Nothing to report.

**Appendix (B)(I)(C) PM Emission Rates**

Nothing to report.

**Appendix (B)(I)(D) Plant-Wide Annual Cap and Monthly Cap**

CD Paragraph 69: OE complied with the Plant-Wide Annual Cap for the Sammis Plant for NO<sub>x</sub>, which applies collectively to all units within the Sammis Plant for the period July 1, 2005 through December 31, 2005. The Plant-Wide Annual Cap was 11,371 tons and the actual emissions for this period were 11,266 tons.

CD Paragraph 70: Compliance with the Plant-Wide Annual Cap for the period July 1, 2005 through December 31, 2005 was determined by calculating actual annual emission during all periods of operation from the Sammis Plant using CEMS.

CD Paragraph 93: OE complied with the Plant-Wide Annual Cap for the Sammis Plant for SO<sub>2</sub>, which applies collectively to all units within the Sammis Plant for the period July 1, 2005 through December 31, 2005. The Plant-Wide Annual Cap was 58,000 tons and the actual emissions for this period were 49,600 tons.

CD Paragraph 94: Nothing to report.

CD Paragraph 95: Compliance with the Plant-Wide Annual Cap for the period July 1, 2005 through December 31, 2005 was determined by calculating actual annual emissions during all periods of operation from the Sammis Plant using CEMS.

**Appendix (B)(I)(E) Additional Reductions**

Nothing to report.

**Appendix (B)(I)(F) Interim Reductions for NO<sub>x</sub> and SO<sub>2</sub>**

CD Paragraph 72: OE achieved interim NO<sub>x</sub> emission reductions of 105 tons by emitting fewer tons than the Plant-Wide Annual Cap for NO<sub>x</sub> emissions at the Sammis Plant for the period July 1, 2005 through December 31, 2005.

CD Paragraph 97: OE achieved interim SO<sub>2</sub> emission reductions of 8,400 tons by emitting fewer tons than the Plant-Wide Annual Cap for SO<sub>2</sub> emissions at the Sammis Plant for the period July 1, 2005 through December 31, 2005.

**Appendix (B)(I)(G) Surrender of Restricted SO<sub>2</sub> Allowances**

Nothing to report.

**Appendix (B)(I)(H) Generation of Super-Compliant Allowances**

Nothing to report.

**Appendix (B)(I)(I) NO<sub>x</sub> System-Wide Annual Emission Rate**

Nothing to report.

**Appendix (B)(I)(J) Environmentally Beneficial Projects**

Nothing to report.

**Appendix (B)(II) Deviation Reports**

Nothing to report.

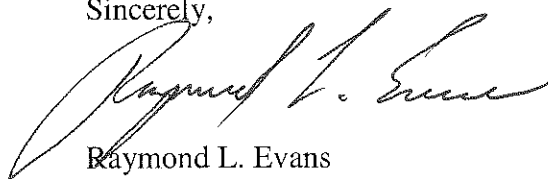
**Appendix (B)(III) Ohio Edison Submissions**

| Date Submitted | Plans/Submissions | Pending Review and Approval |
|----------------|-------------------|-----------------------------|
| 8-19-2005      | Notification      | N/A                         |
| 1-4-2006       | Force Majeure     | Approved                    |

**Certification**

*"This information was prepared either by me or under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my evaluation, or the direction and my inquiry of the person(s) who manage the system, or the persons(s) directly responsible for gathering the information, I hereby certify under penalty of law that, to the best of my knowledge and belief, this information is true, accurate, and complete. I understand that there are significant penalties for submitting false, inaccurate, or incomplete information to the United States"*

Sincerely,



Raymond L. Evans  
Manager  
Environmental Monitoring and Reporting

rle/paf  
Attachment





| Activity Description                     | % Comp | Current Start | Current Finish |      |      |      |      |      |      |      |
|------------------------------------------|--------|---------------|----------------|------|------|------|------|------|------|------|
|                                          |        |               |                | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 |
| Testing & Optimization                   | 23     | 12/16/05A     | 06/30/06       |      |      |      |      |      |      |      |
| <b>Mansfield 2</b>                       |        |               |                |      |      |      |      |      |      |      |
| Wet Flue Gas Desulfurization (WFGD)      |        |               |                |      |      |      |      |      |      |      |
| Engineering                              | 75     | 07/04/05A     | 04/12/06       |      |      |      |      |      |      |      |
| Procurement                              | 35     | 09/24/05A     | 09/23/06       |      |      |      |      |      |      |      |
| Construction                             | 0      | 09/23/06      | 12/02/06       |      |      |      |      |      |      |      |
| C.O.D. - MN2 WFGD                        | 0      |               | 12/31/06*      |      |      |      |      |      |      |      |
| Testing & Optimization                   | 0      | 12/03/06      | 06/30/07       |      |      |      |      |      |      |      |
| <b>Mansfield 3</b>                       |        |               |                |      |      |      |      |      |      |      |
| Wet Flue Gas Desulfurization (WFGD)      |        |               |                |      |      |      |      |      |      |      |
| Engineering                              | 0      | 01/31/06      | 03/01/07       |      |      |      |      |      |      |      |
| Procurement                              | 0      | 05/02/06      | 09/20/07       |      |      |      |      |      |      |      |
| C.O.D. - MN3 WFGD                        | 0      |               | 10/31/07*      |      |      |      |      |      |      |      |
| Outage                                   | 0      | 09/29/07      | 12/08/07*      |      |      |      |      |      |      |      |
| Construction                             | 0      | 09/29/07      | 12/08/07       |      |      |      |      |      |      |      |
| Testing & Optimization                   | 0      | 12/09/07      | 04/28/08       |      |      |      |      |      |      |      |
| <b>Eastlake 5</b>                        |        |               |                |      |      |      |      |      |      |      |
| Selective Non-Catalytic Reduction (SNCR) |        |               |                |      |      |      |      |      |      |      |
| Engineering                              | 50     | 08/01/05A     | 07/30/06       |      |      |      |      |      |      |      |
| Procurement                              | 0      | 03/19/06      | 09/28/06       |      |      |      |      |      |      |      |
| C.O.D. - EL5 SNCR                        | 0      |               | 12/31/06*      |      |      |      |      |      |      |      |
| Construction                             | 0      | 08/07/06      | 03/12/07       |      |      |      |      |      |      |      |
| Outage                                   | 0      | 02/26/07      | 03/12/07*      |      |      |      |      |      |      |      |
| Startup & Optimization                   | 0      | 03/13/07      | 04/30/07       |      |      |      |      |      |      |      |

C.O.D. - Consent Decree Date

(1) Unit will not start up until project is complete.